

# Attachment A

STATE OF ILLINOIS     )  
                                      )  
COUNTY OF COOK     )     SS

**AFFIDAVIT**

I, Brian Wentz, being duly sworn, state as follows:

**Background of Affiant**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since approximately 2003. I am currently assigned to the FBI's South Resident Agency, and my responsibilities include the investigation of violent crimes.

**Basis and Purpose of Affidavit**

2. The information in this Affidavit is based on interviews of witnesses, my own observations and actions, information received from other law enforcement agents, my experience and training, and the experience of other agents.

3. This Affidavit is submitted for the limited purposes of establishing that there are specific and articulable facts showing that there are reasonable grounds to believe that the information sought in the attached Motion pursuant to 18 U.S.C. § 2703 is relevant and material to an ongoing criminal investigation of allegations that Tonisha Williams robbed the First Bank, located at 8480 South Archer, Willow Springs, Illinois on July 8, 2006.

4. Because of the limited purpose of this Affidavit, I have not included all of the facts known to me or other law enforcement officers about the investigation.

### **The Subject Phone**

5. The telephone phone that is the subject of the attached application is currently assigned telephone number 773-454-5858, subscribed to and used by Tonisha Williams, and operated on the network of Sprint ("**Williams cellular phone**").

6. As further set forth below, there is reason to believe that **Williams cellular phone** has been used in furtherance of criminal offenses, namely bank robbery, in violation of Title 18, United States Code, Section 2113(a), in violation of Title 18, Section 2113(a).

### **Background of the Investigation**

7. On July 7, 2006, at approximately 4:45 p.m., two people entered First Bank, a federally insured institution, located at 8480 South Archer, Willow Springs, Illinois. Individual A, a First Bank employee later interviewed as part of this investigation and who personally observed and interacted with the couple at the time, described them as an African-American male and an African-American female. Individual A further described the couple as appearing nervous, with the male acting as if he was "casing" the bank. Individual A actually spoke to the couple. The female informed her, among other things, that her name was "Denise" and the male stated that his name was "Dre." Individual A notified the assistant bank manager, Individual B, that she thought the couple was acting suspiciously as she noticed that the male individual continued to appear to be casing the bank. The couple was then observed leaving the bank. Individual A and B observed the couple walking away from the bank and enter a beige colored car with another male African-American.

8. Because of the suspicious conduct of the couple, Individual A exited the bank, entered her own vehicle, and followed the three individuals after they left in the beige colored car. Based on her observation, Individual A later described the beige car as a four door Chevrolet Lumina with Illinois license plate number F903477. Individual A also identified the driver of the Chevrolet Lumina as "Denise" with "Dre" and the unidentified male as passengers.

9. On the following day, July 8, 2006, at approximately 10:20 a.m., First Bank was robbed by two individuals. Bank employees, including Individuals A, B, and C, who were interviewed by law enforcement authorities subsequent to the robbery, described the robbers as an African-American male and an African-American female. Bank employees described the female robber as being approximately 25-30 years old, approximately 5'6" tall, and wearing sunglasses, latex gloves, and grey colored sweat pants with some type of white padding protruding from around her waist as if she was wearing a diaper.

10. First Bank employees additionally told the FBI that the female robber walked over to a teller's counter and after several unsuccessful attempts, climbed over the teller counter. The female robber then opened several teller's drawers and removed United States currency. The female robber stuffed the money into her pants in the area of the white padding that she was wearing. The female robber then attempted to enter the vault area of the bank but was unsuccessful as it was locked.

11. Bank employees further stated that the male robber remained in the lobby area of the bank and told bank employees words to the effect, "Everybody get down" and "Don't touch anything and don't touch the alarm." Throughout this time, the male robber was holding the handgun.

12. After obtaining the money, the robbers exited the bank. Bank employees and customers in the bank's drive-through facility outside the bank observed the male and female robbers exit the bank and enter a car in the bank parking lot occupied by a third individual, who was observed to be an African-American male. One of the bank customers subsequently provided bank employees with a description of the vehicle, specifically, a beige colored Chevrolet Lumina with Illinois license plate number F903477. This description and license number matched the information obtained by Individual A the previous day in relation to the suspicious couple, "Denise" and "Dre."

13. A subsequent audit conducted by First Bank revealed that on July 8, 2006, the two robbers took approximately \$4,881 in United States currency as a result of the robbery.

14. A subsequent FBI review of tapes from the bank video surveillance system that recorded the events of July 7 and July 8, 2006 described herein corroborates many of the observations of the bank employees set forth above. Among other things, the video surveillance tape reflects that the July 8, 2006, robbery was carried out by two individuals, a male and a female African-American. The video surveillance tape reflects the robbers to

be similar in general appearance to the two individuals who identified themselves to Individual A as "Denise" and "Dre" during the July 7, 2006, visit to the bank.

15. A review of Illinois Secretary of State vehicle registration databases revealed that Illinois license registration number F903477 was registered to Jean Seals, 7219 South Winchester, Chicago, Illinois. Seals is identified as an African-American having a birth date of June 6, 1938, being approximately 68 years old. Further investigation by the FBI confirmed that an individual matching the description of the female robber -- Tonisha Denise Williams -- resided at the Winchester address.

16. A photograph of Tonisha Williams was put in a photo display and shown to a bank employee who identified her as the female robber.

17. A warrant for Williams' arrest was issued on July 24, 2007. In a voluntary statement, Williams indicated that she was at her place of employment, the Cheesecake Factory located in Chicago, Illinois, on the dates and times of the bank casing and bank robbery.

18. Co-defendant Grayson provided a grand jury statement and identified Tonisha Williams as the female individual who robbed the First Bank on July 8, 2006. Grayson further stated that he (Grayson) acted as the get away driver.

19. Co-defendant Thomas also gave a voluntary statement, during which he admitted that he was the individual who accompanied Tonisha Williams to the First Bank on July 7, 2006. He further stated that on the morning of July 8, 2008, he was approached by

Williams to rob the First Bank. Thomas declined Williams' request but indicated that he helped Williams to obtain a gun for the bank robbery.

20. Subsequent to Williams' post-arrest interview, telephone records were obtained for Williams' cellular telephone. Those records indicate that Williams used her cellular telephone around the time that the bank casing and bank robbery occurred. Therefore, cell site information would establish where Williams was at the time she used her cellular telephone and to whom she was speaking. This evidence will serve to either corroborate or contradict Williams' statement regarding her whereabouts on the dates and times in question.

#### **Planned Investigation**

21. The FBI plans to use the information requested in the attached Application to determine Williams' whereabouts on July 7 and July 8, 2006, and to whom she was speaking. This evidence will either corroborate or contradict Williams' statement that she was at work on the dates and times in question.

22. The FBI further plans to use the information requested in the attached Application to identify and locate individuals who are in contact with the offender or offenders and may be able to provide information relevant to the investigation.

#### **Relevancy & Materiality of Historical Call Detail and Information**

23. Based on my training and experience, I believe that there are reasonable grounds to believe that historical call detail records and historical cell site information reflecting the cell tower and antenna face used at the start and end of each call, for **Williams**

**cellular phone** for the period from July 1, 2006 through July 31, 2006, are relevant and material to the ongoing investigation. Among other things, law enforcement officers can use historical call detail records and historical cell site information to analyze the past use of **Williams cellular phone** and thereby obtain information about the subject's co-conspirators, associates, whereabouts, and activities, as well as patterns of behavior. In particular, the cell site information will establish the whereabouts of Williams at the time of the bank robbery.



Brian Wentz  
Special Agent, Federal Bureau of Investigation ("FBI")

Subscribed and sworn before me  
on this 19th day of September, 2008

  
NOTARY PUBLIC